UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI

CAROLYN BETTON, et al.,)	
Plaintiffs,)	
V.)	Case No. 4:05CV1455 (JCH)
ST. LOUIS COUNTY, MISSOURI,)	
Defendant.)	

DECLARATION OF M. BETH FETTERMAN

M. Beth Fetterman states as follows:

- 1. I am an attorney with the law firm of Sowers & Wolf, LLC. I make this Declaration of my own personal knowledge.
- 2. I have been practicing in the area of employment and civil rights litigation since 2007. My practice includes work in Missouri and, specifically, within the area covered by the U.S. District Court for the Eastern District of Missouri.
 - 3. I work under the direction D. Eric Sowers and Ferne P. Wolf.
- 4. I am a 2007 graduate of the Saint Louis University School of Law and was admitted to the Missouri Bar that same year. I am licensed to practice law in Missouri, and admitted to practice in the U.S. District Courts for the Eastern and Western Districts of Missouri and the Southern District of Illinois.
- 5. From 2005 to 2007, I worked as a law clerk, under the direction of D. Eric Sowers and Ferne P. Wolf.
- 6. I am a member of the Missouri Bar's Labor and Employment Law Committee and Solo and Small Firm Committee.

EXHIBIT

Seg 3

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- 7. My current hourly rate for representing plaintiffs in connection with employment litigation is \$250.00 per hour.
 - 8. I worked on this case as needed as indicated on the attached time sheet.
 - 9. I declare under penalty of perjury that the foregoing is true and correct.

Executed:	•
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March 16, 2010

M. B**eth** Fetterman

Hours Submitted by Beth Fetterman RE Betton v. St. Louis County

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8/13/2008	1./5	Case Strategy Cont w/ DES, FPW and RT (Left Early)
6/2/2009	0:30	Conf w/ DES and FPW RE Additional Discovery To Be Done
2/6/2009	0.50	Prepared 2nd IRROGS and 2nd RFP for Service to Opposing Counsel
7/6/2009	1.00	Draft and File ADR Referral
8/24/2009	0.50	Drafted Joint Motion for DES and M. Schuman RE Amend Case Mgt Order
		Prepared and Mailed Notices of Depositon for Muehleusler, Leahy, Farmer,
10/5/2009	1.25	Surgener, Arranged for Court Reporter
10/9/2009	09'0	Conf w/DES and FPW RE Defendants' Discovery Responses and Depositions
11/6/2009	0.60	Conf w/ DES and FPW RE Case Strategy, Mediation and Follow Up Depositions
		Prepared and Mailed Notices of Depositon for Peterson, Losing, Edison, Suddarth
12/23/2009	1.25	and Grimm; Arranged for Court Reporter
1/11/2010	0.25	Call to Betton RE Times & Locations of January Depositions
1/13/2010	0.50	Call w/ M.Schuman RE Return of Plaintiff's Documents Produced by Defendant
1/13/2010	1.00	Prepare File for Trial
		Conf. w/ Mike Schuman RE
1/13/2010	0.50	Logistics of Returning Documents Produced by Defendant to Defendant
1/14/2010	0.25	Email to Ct. Reporter RE Location of Deposition
1/15/2010	0.25	Deliver Documents Requested by M. Schuman to Schuman
1/21/2010	0.50	Conf w/ DES and FPW RE Jury Instructions and Research Regarding Same
1/21/2010	0.25	Coordinate w/ M. Schuman RE Picking Up Files
1/27/2010	0.25	Coordinate w/ M. Schuman RE Location to Meet RE File Transfer
2/5/2010	1.25	Design STL Co. Organization Chart for Use as Trial Exhibit
2/8/2010	1.60	Conf w/ DES and FPW RE Stipulations and Pretrial Compliance
2/8/2010	3.75	Prepare (Pull, Label, Copy, etc.) Exhibits for Trial
3/1/2010	3.75	Attend Trial for Assistance; Meet w/ Clients
3/2/2010	2.50	Attend Trial for Assistance; Meet w/ Clients
		Assisted DES and FPW w/
3/2/2010	2.75	Review of File and Exhibits at Office in Anticipation of Day 3
3/3/2010	2.50	Attend Trial for Assistance; Meet w/ Clients
3/3/2010	0.50	Trial/Research
3/4/2010	3.50	Attend Trial for Assistance; Meet w/ Clients
3/8/2010	2.50	Attend Trial for Assistance; Meet w/ Clients
3/15/2010	1.40	Preparation of Affidavit and Hours
	37.50	TOTAL HOURS